

on Inc.  
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sharph, PA 15222-1312



SDMS DocID 2157746

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ORIGINAL

**VIACOM**

***Via Airborne Express***

September 25, 2003

Mr. Patrick Egan (3HS11)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: *Lower Darby Creek Area Superfund Site – Clearview Landfill, Folcroft Landfill  
and Folcroft Landfill Annex*

Dear Mr. Egan:

Enclosed is the response of Viacom Inc. ("Viacom"), successor in interest to CBS Corporation formerly known as Westinghouse Electric Corporation ("Westinghouse") to EPA's Required Submission of Information for the above referenced Site.

It is our understanding that, to date, EPA has been unable to find any documentation linking Westinghouse to the Site. As previously discussed, we would appreciate receiving a copy of the Progress Pollution Report, a copy of the interview summary for the driver who claims to have picked up waste from Westinghouse, and any additional information that may tie Westinghouse to the Site.

Viacom submits this response without admitting any liability or any issue of law or fact, and without waiving its right to object to admissibility, relevancy, materiality, accuracy, genuineness, or confidentiality of the information contained herein or to the weight, if any, to be given to the information, or whether any privilege would attach to any of the information.

Viacom cannot rule out the possibility that it may find information that supplements, contradicts or replaces the information upon which this response is made. For this reason and others, Viacom further reserves its rights to supplement this response should additional information come to light and to change the information supplied or any position taken. Viacom also submits this response without prejudice to any position Viacom may take in connection with any other action or related matter.

If you have any questions relative to the attached, please do not hesitate to contact me.

Very truly yours,

William D. Wall  
Vice President, Senior Counsel

Enclosures

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Viacom Inc.'s Response to  
United States Environmental Protection Agency Region III  
Required Submission of Information  
Lower Darby Creek Area Superfund Site  
Clearview Landfill, Folcroft Landfill, and Folcroft Landfill Annex  
Delaware and Philadelphia Counties, Pennsylvania

Viacom Inc. ("Viacom"), the successor in interest to CBS Corporation, formerly known as Westinghouse Electric Corporation ("Westinghouse"), submits these responses to the United States Environmental Protection Agency's Required Submission of Information (the "Request") dated June 9, 2003. Viacom's responses are based on the available data of Westinghouse for the relevant time period.

Questions relative to the responses to EPA's Request should be directed to: William D. Wall, Vice President - Senior Counsel, Viacom Inc., 11 Stanwix Street, Pittsburgh, PA 15222, Telephone: 412-642-3580, Facsimile: 412-642-3923, e-mail: [william.wall@viacom.com](mailto:william.wall@viacom.com).

General and Specific Objections

1. Viacom objects to the Request on the grounds and to the extent that the Request seeks to impose upon Viacom obligations relating to the identification and disclosure of confidential information that are different from, other than, or in addition to, those obligations set forth in 40 C.F.R., Part 2 and CERCLA Section 104(e)(7).
2. Viacom objects to the Request on the grounds that it implies or infers responsibility with respect to hazardous substances that is different from, or broader than, that imposed by Section 107 of CERCLA, 42 U.S.C. §9607 or Section 7003 of RCRA, 42 U.S.C. §6873.
3. Viacom objects to the Request on the grounds and to the extent that it seeks to impose upon Viacom obligations relating to the investigation for, disclosure of, and representations concerning any information responsive to the Request that are different from, other than, or in addition to Section 104 of CERCLA, 42 U.S.C. §9604 or Section 3007 of RCRA, 42 U.S.C. §6972.
4. Viacom objects to the Request on the grounds and to the extent it attempts to impose upon Viacom obligations contrary to the provisions of Article III of the United States Constitution and Title 28 of the United States Code.
5. Viacom objects to the definition of "arrangement" set forth in Enclosure D, Definitions, of the Request on the grounds that such definition seeks to impose upon Viacom obligations relating to the investigation for and disclosure of information responsive to the Request that are

different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA, 42 U.S.C. §9604, or Section 3007 of RCRA, 42 U.S.C. §6972.

6. Viacom objects to the definition of "documents" set forth in Enclosure D, Definitions, of the Request on the grounds that said definition seeks to impose upon Viacom obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA, 42 U.S.C. §9604, or Section 3007 of RCRA, 42 U.S.C. §6972.

7. Viacom objects to the definition of "waste" or "wastes" set forth in Enclosure D, Definitions, of the request on the grounds that said definition seeks to expand the definition of hazardous waste beyond that set forth in Section 101(29) of CERCLA. Viacom shall respond to the Request using the definition set forth in Section 101(29). To the extent that any information provided in response to the Request relates to substances other than those defined in Section 101(29) of CERCLA, Viacom does not waive this objection.

8. Viacom objects to the definition of "you" set forth in Enclosure D, Definitions, of the Request on the grounds that said definition seeks to impose upon persons other than the recipient to whom the Request was directed, obligations relating to the investigation for, disclosure of, and representations concerning any information responsive to the Request.

#### Responses and Specific Objections

1. State the name of your company, its mailing address, and telephone number. Further identify:

***Response:***

***Viacom Inc.  
11 Stanwix Street  
Pittsburgh, PA 15222  
Telephone: 412-642-3580 (William D. Wall, Vice President – Senior Counsel)***

- a. The dates and states of incorporation of your company;

***Response:***

***Viacom Inc.  
November 10, 1986  
Delaware***

- b. The date and original state of incorporation of your company; and

**Westinghouse Electric Corporation  
January 8, 1886  
Pennsylvania**

- c. The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.

***Response:***

***Viacom objects to this Request on the grounds that it seeks to impose obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA.***

***Viacom further objects to this Request on the grounds that it is vague, ambiguous, overbroad, and unduly burdensome. Subject to and without waiving the foregoing General and Specific Objections, Viacom states that the name of its parent corporation is Viacom Inc. and submits as Exhibit A "Viacom Affiliated Companies."***

2. What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.

***Response:***

***Viacom objects to this Request on the grounds that it seeks to impose obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA.***

***Viacom further objects to this Request on the grounds that it is vague, ambiguous, overbroad, and unduly burdensome. Subject to and without waiving the foregoing General and Specific Objections, Viacom states as to the current nature of business or activity Westinghouse no longer operates any business in the Philadelphia, Pennsylvania area.***

***As to the period 1958 to 1976, Viacom responds that it has been determined through a thorough search of its records that it has no documentation related to the Site. However, the following former Westinghouse locations in the Philadelphia,***

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*Pennsylvania area were used as office or warehouse space and as such are not relevant to EPA's request for information.*

- *Electric and Steam Service Departments  
381 Baltimore Pike  
Springfield, PA 19064*

*Provided customers with equipment installation and field service.*

- *Westinghouse Appliance Sales and Service Company ("WASSCO"),  
Elevator and X-Ray Divisions  
Sales, Warehouse, and Service Departments  
1300 Belmont Avenue  
Philadelphia, PA 19104*

*Consumer Appliance, Elevator, and X-Ray equipment sales, warehouse, and service.*

- *WESCO  
Sales, Accounting, and Warehouse  
141 N. 11<sup>th</sup> Street  
Philadelphia, PA 19107*

*General office and warehouse for distribution of electrical equipment.*

*Various Sales Offices  
One Decker Square  
Bala Cynwyd, PA 19004*

*General office work related to sale of products.*

*The following former Westinghouse locations in the Philadelphia, Pennsylvania area were used as a repair shop or manufacturing facility.*

- *Manufacturing and Repair Shop  
126 South 30<sup>th</sup> Street, Lower Level  
Philadelphia, PA 19104*

*Rendered repair service on electrical and mechanical equipment.*

- *Steam Divisions  
Lester Branch  
PO. Box 9175  
Philadelphia, PA 19113*

***The design and manufacture of power generation equipment.***


***The current business operations of Viacom are a diversified entertainment and media company.***

3. Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.

***Response:***

***Viacom objects to this Request on the grounds that it seeks to impose obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA.***

***Viacom further objects to this Request on the grounds that it is vague, ambiguous, overbroad, and unduly burdensome. Without waiving the foregoing General and Specific Objections, Viacom responds that it has identified the following individuals who may possess knowledge relative to the operations and waste disposal practices of the Lester facility.***

1. ***George Bartsch (deceased) – Manager, Maintenance***
2. ***Albert Lagore (deceased) – Materials and Parts Manager***
4. ***Harry McElwee – Purchasing Department***
5. ***Bill Whitmore – Manager, Maintenance and Services***
5. ***Joseph Waldron – Maintenance and Services***  

6. ***E. M. Burns (deceased)***
7. ***D. Ferguson – Purchasing***
8. ***C. R. Hautz (deceased) – Salvage Department***

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***Viacom reserves its right to supplement any and all parts of this Response, should it locate additional information or documents.***

4. Identify the owners and operators of your establishment(s) in the Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide:
  - a. The dates of their operation;
  - b. The nature of their operation; and
  - c. All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).

***Response:***

***Viacom objects to this Request on the grounds that it seeks to impose obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA.***

***Viacom further objects to this Request on the grounds that it is vague, ambiguous, overbroad, and unduly burdensome. Without waiving the foregoing General and Specific Objections, Viacom responds as follows:***

- ***Manufacturing and Repair Shop  
126 South 30<sup>th</sup> Street, Lower Level  
Philadelphia, PA 19104***

***From 1958 to June 30, 1986, Westinghouse Electric Corporation was the owner and operator of the facility located at 126 South 30<sup>th</sup> Street. On July 1, 1986, the business including the Philadelphia facility was sold to Eastern Electric Apparatus Repair Company, Inc. ("Eastern Electric").***

- a. ***The date of operation -- circa 1945 to June 30, 1986***
- b. ***The nature of their operation was the service and repair of electrical apparatus and products.***
- c. ***All business records were transferred to Eastern Electric at the time of the sale.***

- ***Steam Divisions  
Lester Branch  
PO. Box 9175  
Philadelphia, PA 19113***
  - a. ***The Lester plant began operation in and around 1917 until the closedown of the operation from 1984 to 1986. On July 2, 1986, the real estate was sold to DKM Corporation ("DKM"). DKM defaulted on the mortgage and Westinghouse took back ownership of the property in 1988 or 1989 and served as landlord for a multi-tenant industrial facility. In December 2002, the property was sold to Berwind Property Group Limited.***
  - b. ***The nature of the Westinghouse operation was the design and manufacture of power generation equipment.***
  - c. ***It has been determined through a thorough search of Viacom records that it has no documentation related to the Site.***

***Viacom reserves its right to supplement this Response should additional information or documents be located.***

5. Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.
  - a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;
  - b. Describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and
  - c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.

***Response:***

***Viacom objects to this Request on the grounds that it seeks to impose obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA.***



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***Viacom further objects to this Request on the grounds that it is vague, ambiguous, overbroad, and unduly burdensome. Without waiving the foregoing General and Specific Objections, Viacom cannot reasonably confirm specific documentation generated by various Westinghouse divisions decades ago. Documents were generally stored according to broad categories such as general business records, financial records, or engineering records. A thorough search of available records did not reveal any documentation relative to the Site.***

6. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:
- a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;
  - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;
  - c. The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;
  - d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored or otherwise handled;
  - e. The types and sizes of containers in which these substances were transported and stored; and
  - f. The persons or companies that supplied each such hazardous substance to your company.

***Response:***

***See Response to Question 9.***

7. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by-product and waste identified, further provide:
- a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;

- b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste.
- c. The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled:
- d. The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;
- e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and
- f. The location and method of treatment and/or disposal of each such by-product or waste.

***Response:***

***See Response to Question 9.***

8. Did Westinghouse Electric Corporation ever contract with, or make arrangements with any of the following entities, for the removal or disposal of waste from your facilities/establishments in the Philadelphia area between 1958 and 1976:
- a. Folcroft Landfill Corporation;
  - b. Bernie McNichol;
  - c. Edward Mullin;
  - d. Clearview Land Development Corporation;
  - e. Edward or Richard Heller;
  - f. Tri-County Hauling;
  - g. Eastern Industrial Corporation;
  - h. Marvin Jonas or Jonas Waste Removal;
  - i. Bernard McHugh or McHugh Trash Company;
  - j. S. Buckly(ey) Trash Hauling;
  - k. City Wide Services, Inc.;
  - l. Gene Banta of Gene Banta Trash Removal;
  - m. Schiavo Brothers;
  - n. Chrles Crumley or Crumley Waste
  - o. Harman or Harway Trash;
  - p. Oil Tank Lines;
  - q. Paolino Company;
  - r. Charles Crawley Waste Hauling;
  - s. Ed Lafferty and Son;
  - t. Bazzarie Trash Company
  - u. Sparky Barnhouse or ABM Disposal Services Company; and
  - v. Any other individual, company or municipality.

**Response:**

***See Response to Question 9.***

9. For each of the above identified entities with whom Westinghouse Electric Corporation contracted or made arrangements with for waste removal and/or disposal, please identify the following:
- a. The person with whom you made such a contract or arrangement;
  - b. The date(s) on which or time period during which such material was removed or transported for disposal;
  - c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
  - d. The annual quantity (number of loads, gallons, drums) of such material;
  - e. The manner in which such material was containerized for shipment or disposal;
  - f. The location to which such material was transported for disposal;
  - g. The person(s) who selected the location to which such material was transported for disposal;
  - h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and
  - i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.

***Response to Questions 6, 7, 8 and 9:***

***Viacom objects to this Request on the grounds that it seeks to impose obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA.***

***Viacom further objects to this Request on the grounds that it is vague, ambiguous, overbroad, and unduly burdensome. Without waiving the foregoing General and Specific Objections, Viacom responds that it has been determined through a thorough search of its existing records that it has no documentation related to the Site and very***

***limited records available related to Lester's business arrangements with Eastern Industrial. The available documents as described below are attached as Exhibit B.***

- 1. Blanket Purchase Order no. 51-1-63369? (Note: poor quality original) dated 4/28/1976 placed with Eastern Industrial Corporation covering trash removal service for one (1) year period of 4/1/1976 through 3/31/1977.***
- 2. Regional Science Research Institute Solid Waste Study Industrial Survey for the calendar year 1971.***
- 3. Commonwealth of Pennsylvania, Department of Health, Sanitary Engineering, Internal Review and Recommendations, application for permit, No. 2372204 dated 7/12/1973.***
- 4. Item 3 of WCW/Checklist***

***Viacom reserves its right to supplement this Response should additional information or documents be located.***

10. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:
  - a. Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site.
  - b. Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or
  - c. Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either directly or through transshipment points) for disposal or treatment.

***Response:***

***Viacom objects to this Request on the grounds that it seeks to impose obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA.***

***Viacom further objects to this Request on the grounds that it is vague, ambiguous, overbroad, and unduly burdensome. Without waiving the foregoing General and Specific Objections, Viacom responds that it has been determined through a thorough search of its existing records that it has no documentation related to the Site. However, to the extent any arrangements related to waste disposal were made during the relevant time period, they likely would have been made by George, Bartsch, Bill Whitmore, and***

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***Joseph Waldron: See response to Question no. 3 above for information relative to these individuals.***

***Viacom reserves its right to supplement this Response should additional information or documents be located.***

11. For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:
- The date(s) on which such material was disposed of or treated at the Site;
  - The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
  - The annual quantity (number of loads, gallons, drums) of such material;
  - The specific location on the Site where such material was disposed of or treated; and
  - Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's(s') possession regarding arrangements made to dispose of or treat such material at the Site.

***Response:***

***See Response to Question No. 12.***

12. Did your establishment(s), or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:
- The date(s) the spill(s)/release(s) occurred;
  - The composition (i.e., chemical analysis) of the materials which were spilled/released;
  - The response made by you on or on your behalf with respect to the spill(s)/release(s); and
  - The packaging, transportation, and final disposition of the materials which were spilled/released.

***Response to Questions 11 and 12:***

***Viacom objects to this Request to the extent that it seeks to impose obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA.***

***Without waiving the foregoing General and Specific Objections, Viacom responds that it has determined through a thorough search of its existing records it has no documentation related to the Site.***

***Viacom reserves its right to supplement this Response should additional information or documents be located.***

13. Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same persons identified by your answer to question 3, so indicate.

***Response:***

***See Response to Question No. 3.***

14. Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.

***Response:***

***Viacom objects to this Request to the extent that it seeks to impose obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA.***

***Without waiving the foregoing General and Specific Objections, Viacom responds that it has determined through a thorough search of its existing records that it has no documentation related to the Site.***

***Viacom reserves its right to supplement this Response should additional information or documents be located.***

15. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

***Response:***

***Viacom objects to this Request to the extent that it seeks to impose obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA.***

***Without waiving the foregoing General and Specific Objections, Viacom responds that it is unaware of any information related to the Site.***

16. Representative of your establishment(s):
- a. Identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to the company.

***Response:***

***William D. Wall  
Vice President, Senior Counsel  
Viacom Inc.  
11 Stanwix Street  
Pittsburgh, PA 15222  
Telephone: 412-642-3850***

- b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.

***Response:***

***See Response to Question 16.a. above.***

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17. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
- a. Your document retention policy.
  - b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
  - c. A description of the type of information that would have been contained in the documents; and
  - d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

***Response:***

***Viacom objects to this Request to the extent that it seeks to impose obligations relating to the investigation for and disclosure of information responsive to the Request that are different from, other than, or in addition to those obligations set forth in Section 104 of CERCLA.***

***Viacom further objects to this Request on the grounds that it is vague, ambiguous, overbroad, and unduly burdensome. Without waiving the foregoing General and Specific Objections, Viacom states that document retention procedures were implemented which were in full compliance with applicable legal and ethical requirements, and provided for disposal of certain documents in the normal course of business. There was no single length of time for which Westinghouse records were retained. The various retention periods for different types of documents were determined by many factors, including: regulations and statutes in various jurisdictions; contractual requirements; types of documents; litigation requirements and available space.***



**EXHIBIT A**

**VIACOM AFFILIATED COMPANIES**

**This list includes the major operating companies. It should be assumed that similarly named companies are also affiliated.**

<b>NAME</b>	<b>UNIT</b>
BET Arabesque, LLC	Black Entertainment Television, Inc.
BET Holdings Inc.	Viacom Inc.
BET International, Inc.	Black Entertainment Television, Inc.
Big Ticket Productions	Paramount Pictures
Black Entertainment Television, Inc.	BET Holdings, Inc.
Black Rock Enterprises, Inc.	CBS Broadcasting Inc.
Blockbuster Entertainment Corp.	Blockbuster Inc.
CBS Broadcasting Inc.	Westinghouse CBS Holding Company, Inc.
CBS Cable Networks, Inc.	Viacom Inc.
CBS Corporation (f/ka Westinghouse Electric Corp.)	Viacom International Inc.
CBS Worldwide Inc.	CBS Broadcasting Inc.
College Television Network (CTN) (n/k/a MTV Networks on Campus Inc.)	MTV Networks
Comedy Central (Comedy Partners, Inc.)	MTV Networks
country.com, Inc.	Network Enterprises, Inc.
Country Music Television, Inc. (CMT)	O&W Corporation
Creative Film Services Inc. (n/k/a Amazing Race Productions Inc.)	Viacom International Inc.
Famous Music Corporation	Paramount Pictures
Famous Players	Paramount Pictures
FLIX	Showtime Networks Inc.
Infinity Broadcasting Corporation	Viacom Inc.
Viacom Outdoor Inc. (formerly Infinity Outdoor)	Infinity Media Corporation
Infinity Network, Inc.	Infinity Media Corporation
King World Productions, Inc.	Viacom Inc.
Laurel Entertainment	Paramount Pictures
Media Showtime Extreme S.L.	Showtime Networks Inc.
MTV Networks	MTV Networks
MTV: Music Television (MTV2)	MTV Networks
MTVi	MTV Networks
Network Talent, LLC	Network Enterprises, Inc.
Nickelodeon (Nick-at-Nite)	MTV Networks
Noggin	MTV Networks
O&W Corporation	Network Enterprises, Inc.

Outdoor Entertainment, Inc.	O&W Corporation
Paramount Communications Inc. <sup>1</sup>	Viacom Inc.
Paramount Parks	Paramount Parks
Paramount Pictures	Paramount Pictures
Paramount (formerly Premier) Advertiser Sales	Paramount Pictures
Paramount Advertiser Services Inc.	Paramount Pictures
Pocket Books	Simon & Schuster
Republic Entertainment Inc.	Paramount Pictures
Scribner	Simon & Schuster
SET (Showtime Event Television) Pay Per View	Showtime Networks Inc.
Showtime Networks Inc.	Showtime Networks
Simon & Schuster (Consumer)	Simon & Schuster
Spelling Entertainment Group, Inc. (including Charter Oil companies)	Paramount Pictures
SportsLine.com, Inc.	CBS Broadcasting Inc.
Sundance Channel	Showtime Networks
TDI Holdings Limited (TDI)	Transportation Displays Incorporated (n/k/a Viacom Outdoor Group Inc.)
TDI Worldwide, Inc.	Infinity Media Corporation
The Movie Channel (TMC)	Showtime Networks Inc.
Transportation Displays Incorporated (n/k/a Viacom Outdoor Group Inc.)	Viacom Outdoor
(TNN) TNN Productions, Inc.	Network Enterprises, Inc.
TV Land	MTV Networks
United Cinemas International	Paramount Pictures
United International Pictures	Paramount Pictures
UPN (United Paramount Network)	Paramount Pictures
VH1	MTV Networks
Viacom Entertainment Group	Viacom Inc.
Viacom Enterprises	Paramount Pictures
Viacom Interactive Ventures	Viacom Inc.
Viacom Outdoor	Viacom Inc.
Viacom Plus	Viacom Inc.
Viacom Productions	Paramount Pictures
Viacom Television Stations Group (f/k/a Paramount Television Stations Group) (see list below)	Viacom Inc.
Westinghouse Holdings Corporation**	Viacom Inc.

<sup>1</sup> Formerly called Gulf & Western Industries, Inc. Viacom may also be the party in interest in certain litigations involving former units of Gulf & Western including New Jersey Zinc.

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Westwood One, Inc.	Infinity Network, Inc.
Wilshire Court	Paramount Pictures
World Sports Enterprises	Network Enterprises, Inc.
Worldvision Enterprises Inc.	Paramount Pictures
Zone Broadcasting Showtime (Turkey) Limited	Showtime Networks Inc.

\*\* Viacom may also be the party in interest in matters involving Westinghouse Electric Corporation.

<b>VIACOM TELEVISION STATIONS GROUP (f/k/a Paramount Television Stations Group Inc.)</b>	<b>LOCATION</b>
KAUT (TV)	Oklahoma City, Oklahoma
KBHK	San Francisco, California
KCBS (TV)	Los Angeles, California
KCAL (TV)	Los Angeles, California
KCCO (TV) - <i>Satellite</i>	Alexandria, Minnesota
KCCW (TV) - <i>Satellite</i>	Walker, Minnesota
KCNC (TV)	Denver, Colorado
KDKA (TV)	Pittsburgh, Pennsylvania
KEYE (TV)	Austin, Texas
KMAX(TV)	Sacramento, California
KPIX (TV)	San Francisco, California
KSTW (TV)	Tacoma (Seattle), Washington
KTVT (TV)	Dallas-FT. Worth, Texas
KTXA (TV)	Arlington (Dallas), Texas
KUSG (TV) - <i>Satellite</i>	St. George, Utah
KUTV (TV)	Salt Lake City, Utah
KYW (TV)	Philadelphia, Pennsylvania
WBBM (TV)	Chicago, Illinois
WBFS (TV)	Miami, Florida
WBZ (TV)	Boston, Massachusetts
WCBS (TV)	New York, New York
WCCO (TV)	Minneapolis-St. Paul, Minnesota
WFOR (TV)	Miami-Ft. Lauderdale, Florida
WFRV (TV)	Green Bay-Appleton, Wisconsin
WGNT(TV)	Portsmouth (Norfolk), Virginia
WJMN (TV) - <i>Satellite</i>	Marquette, Michigan
WJZ (TV)	Baltimore, Maryland
WKBD (TV)	Detroit, Michigan
WLWC (TV)	Providence, RI-New Bedford, MA
WNDY(TV)	Marion (Indianapolis), Indiana
WNPA(TV)	Pittsburgh, Pennsylvania
WPSG (TV)	Philadelphia, Pennsylvania
WSBK (TV)	Boston, Massachusetts
WTOG (TV)	St. Petersburg (Tampa), Florida
WTVX (TV)	West Palm Beach-Ft Pierce, Florida
WUPA (TV)	Atlanta, Georgia
WUPL(TV)	Slidell (New Orleans), Louisiana
WWHO(TV)	Chillicothe, Ohio (Columbus)
WWJ (TV)	Detroit, Michigan



## RADIO STATION LIST

WVEE-FM	Atlanta
WAOK-AM	Atlanta
WZGC-FM	Atlanta
KQBT-FM	Austin
KJCE-AM	Atlanta
KAMX-FM	Atlanta
KKMJ-FM	Atlanta
WWMX-FM	Baltimore
WXYV-FM	Baltimore
WQSR-FM	Baltimore
WLIF-FM	Baltimore
WJFK-AM	Baltimore
WBMD-AM	Baltimore
WBGR-AM	Baltimore
WBCN-FM	Boston
WBZ-AM	Boston
WODS-FM	Boston
WZLX-FM	Boston
WBMX-FM	Boston
WYRK-FM	Buffalo
WJYE-FM	Buffalo
WECK-AM	Buffalo
WBLK	Buffalo
WBUF	Buffalo
WSOC-FM	Charlotte
WFNZ-AM	Charlotte
WSSS-FM	Charlotte
WNKS-FM	Charlotte
WPEG-FM	Charlotte
WGIV-AM	Charlotte
WBAV-FM	Charlotte
WBBM-AM	Chicago
WBBM-FM	Chicago
WXRT-FM	Chicago
WSCR-AM	Chicago
WCKG-FM	Chicago
WJMK-FM	Chicago
WUSN-FM	Chicago
WGRR-FM	Cincinnati
WKRQ-FM	Cincinnati
WAQZ-FM	Cincinnati
WUBE-FM	Cincinnati
WXTM-FM	Cleveland
WNCX-FM	Cleveland
WDOK-FM	Cleveland
WQAL-FM	Cleveland
WLVQ-FM	Columbus
WAZU-FM	Columbus
WHOK-FM	Columbus

KLUV-FM	Dallas
KOAI-FM	Dallas
KRBV-FM	Dallas
KYNG-FM	Dallas
KRLD-AM	Dallas
KVIL-FM	Dallas
KDJM-FM	Denver
KIMN-FM	Denver
KXKL-FM	Denver
WKRK-FM	Detroit
WOMC-FM	Detroit
WWJ-AM	Detroit
WXYT-AM	Detroit
WVMV-FM	Detroit
WYCD-FM	Detroit
KVSR-FM	Fresno
KOQO-FM	Fresno
KOOR-AM	Fresno
KRNC-FM	Fresno
KSKS-FM	Fresno
KMJ-AM	Fresno
KMGV-FM	Fresno
WSJS-AM	Greensboro/ Winston Salem
WSML-AM	Greensboro/ Winston Salem
WMFR-AM	Greensboro/ Winston Salem
WZMX-FM	Hartford
WRCH-FM	Hartford
WTIC-FM	Hartford
WTIC-AM	Hartford
KILT-AM	Houston
KILT-FM	Houston
KIKK-AM	Houston
KIKK-FM	Houston
KFKF-FM	Kansas city
KBEQ-FM	Kansas city
KSRC-FM	Kansas city
KMXV-FM	Kansas city
KXTE-FM	Las Vegas
KLUC-FM	Las Vegas
KSFN-AM	Las Vegas
KXNT-AM	Las Vegas
KMZQ-FM	Las Vegas
KMXB-FM	Las Vegas
KCBS-FM	Los Angeles
KFWB-AM	Los Angeles
KLSX-FM	Los Angeles
KNX-AM	Los Angeles
KROQ-FM	Los Angeles
KRTH-FM	Los Angeles
KTWV-FM	Los Angeles

WMC-AM	Memphis
WMC-FM	Memphis
WMFS-FM	Memphis
WCCO-AM	Minneapolis
KCCO-AM	Minneapolis
WLTE-FM	Minneapolis
WXPT-FM	New York
WCBS-AM	New York
WCBS-FM	New York
WFAN-AM	New York
WINS-AM	New York
WNEW-FM	New York
WXRK-FM	New York
WJHM-FM	Orlando
WOCL-FM	Orlando
WOMX-FM	Orlando
KEZN-FM	Palm springs
KYW-AM	Philadelphia
WIP-AM	Philadelphia
WOGL-FM	Philadelphia
WPHT-AM	Philadelphia
WYSP-FM	Philadelphia
KZON-FM	Phoenix
KMLE-FM107	Phoenix
KOOL-FM	Phoenix
KDKA-AM	Pittsburgh
WBZZ-FM	Pittsburgh
WZPT-FM	Pittsburgh
WDSY-FM	Pittsburgh
KINK-FM	Portland
KUFO-FM	Portland
KUFO-AM	Portland
KVMX-FM	Portland
KUPL-FM	Portland
KLTH-FM	Portland
KFRG-FM	Riverside
KXFG-FM	Riverside
KVFG-FM	Riverside
KRAK-AM	Riverside
WRMM-FM	Rochester
WZNE-FM	Rochester
WCMP-FM	Rochester
WPXY-FM	Rochester
KSFM-FM	Sacramento
KXOA-FM	Sacramento
KNCI-FM	Sacramento
KHTK-AM	Sacramento
KZZO-FM	Sacramento
KYMX-FM	Sacramento
KMOX-AM	St. Louis
KEZK-FM	St. Louis
KYKY-FM	St. Louis

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KTSA-AM	San Antonio
KTFM-FM	San Antonio
KYXY-FM	San Diego
KPLN-FM	San Diego
KCBS-AM	San Francisco
KFRC-AM	San Francisco
KFRC-FM	San Francisco
KYCY-AM	San Francisco
KKWV-FM	San Francisco
KITS-FM	San Francisco
KLLC-FM	San Francisco
KBAY-FM	San Jose
KEZR-FM	San Jose
KBKS-FM	Seattle
KYCW-AM	Seattle
KYPT-FM	Seattle
KMPS-FM	Seattle
KZOK-FM	Seattle
WQYK-AM	Tampa
WQYK-FM	Tampa
WYUU-FM	Tampa
WRBQ-FM	Tampa
WLLD-FM	Tampa
WSJT-FM	Tampa
WARW-FM	Washington, D.C
WHFS-FM	Washington, D.C
WJFK-FM	Washington, D.C
WPGC-AM	Washington, D.C
WPGC-FM	Washington, D.C
WIRK-FM	West Palm Beach
WEAT-FM	West Palm Beach
WMBX-FM	West Palm Beach
WPBZ-FM	West Palm Beach
WJBW-FM	West Palm Beach



**Exhibit B**



DATE 4-29-76	ORDER NO. 51- 1-633694
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### **SPECIAL INSTRUCTIONS**

**BEST AVAILABLE COPY.**

QTY	DESCRIPTION (NAME OF PART, STYLE NO., DWG. & ITEM, P. D. SPEC., ETC.)	UNIT PRICE	TOTAL PRICE
<b>BLANKET ORDER</b>			

THE ATTACHED APPENDICES DEG & TUE CLAUSE PERTAINING TO THE  
OCCUPATIONAL SAFETY & HEALTH ACT OF 1970 APPLY TO THIS ORDER.

	TRANSP. CHARGES	CASH TERMS Net 30 Days	ADDRESS CORRESPONDENCE TO E. H. BURNS (77)
SHIPPING DATE see body of order	SHIP VIA		AUTHORIZED BY D. Ferguson

[illegible]

4/18/75

Indemnity Agreement

Eastern Industrial Corp. represents that they have current permits from appropriate state and local agencies to transport and dispose of the materials delivered under this order. Eastern Industrial Corp. assumes complete and exclusive control of the said materials and will dispose of the same in accordance with his permits and all applicable laws and regulations.

Furthermore, Eastern Industrial Corp. hereby agrees to indemnify, hold harmless, and defend Westinghouse Electric Corporation from and against any and all actions or causes of action, claims, demands, loss, damage, expense, or liabilities of every nature and description, including attorney's fees, which Westinghouse Electric Corporation may suffer or incur by any reason arising out of or any matter connected with the work to be performed hereunder, or which Westinghouse Electric Corporation may sustain or incur in connection with any litigation, investigation, whether governmental or private, and other expenditures incident thereto, including any suit instituted to enforce the obligations of this agreement of indemnity.

Addendum 1

MARCH 11, 1977  
~~January 31, 1973~~

I. New Contract would cover the following containers:

- 4 40 Cubic Yard Packer Bodies
- 3 40 Cubic Yard Open Top Roll Off
- 10 30 Cubic Yard Open Top Roll Off

II. Supplier must provide the following :

- A. Must have tractor trailers available on call for handling large and bulky items.
- B. Must be ready to modify number and type of containers presently in use.
- C. Must agree to make temporary relocations of containers on request at no additional charge.

## COST INFORMATION SHEET

Page 1

P.O. 51-1-63369

Dated 4-1-76

### A. Compacted Refuse

Eastern shall supply four (4) compaction containers compatible with our compactors for the storage and hauling of trash. Each container will have a minimum rated capacity of 39.8 cubic yards, nominal 40 cubic yards.

#### Cost per removal:

Monday thru Friday (7:00 AM - 4:00 PM)	\$80.50
Saturdays - additional	7.50
Sundays and Holidays - upon request	

### B. Non-Compacted Refuse

Eastern shall supply thirteen (13) open containers, consisting of ten (10) thirty cubic yard units and three (3) forty cubic yard units.

#### Cost per removal:

Monday thru Friday (7:00 AM - 4:00 PM)	
Forty (40) cubic yard open	\$79.25
Thirty (30) cubic yard open -	74.25
Saturdays - additional	7.50

### Conditions - Compacted and Non-Compacted Refuse

Containers will be used for the storage and hauling of trash and rubbish. In no event shall they contain explosives, radio-active waste, hazardous waste or chemicals, extremely flammable items, liquid wastes or any drums (full or empty).

Maximum payload is 20,000 pounds, and shall not exceed the height, width or length of the containers.

Holidays are: New Years Day, Memorial Day, July 4th, Good Friday, Thanksgiving and Christmas.

## COST INFORMATION SHEET

Page 2  
P.O. 51-1-631696  
Dated 4-1-76

### Container Charge

Per month, for each 40 cu.yd. compactor	\$ 71.25 X 4 =	\$ 285.00
Per month, for each 40 cu.yd. open top	60.00 X 3 =	180.00
Per month, for each 30 cu.yd. open top	50.00 X 10 =	<u>500.00</u>
Total		\$ 965.00

### C. Wood Removal

Eastern will supply a tractor and flatbed trailer (40') for the removal of bulky items on a 24 hour notice basis.

The cost per removal will be eighty-five (\$85.00) plus \$22.00 per hour, after the first hour, while in plant loading, calculated to nearest quarter hour.

### D. Miscellaneous Items

All miscellaneous items, including drums, will be priced on an individual basis depending on the nature of the material and the disposal site which must be utilized.





Regional Science Research Institute Solid Waste Study Industrial Survey

Please complete this questionnaire  
and mail to:

Solid Waste Study  
Regional Science Research Institute  
G.P.O. Box 8776  
Philadelphia, Pennsylvania 19101

If any questions arise with  
regard to specific items in  
this questionnaire, please call:

Mr. Gene Steiker  
BA2-3940 or BA2-6540

Information is requested for the calendar year 1971. If it is not  
possible to provide data for 1971, please specify the year used.

Please report information for the plant listed below.

Westinghouse Electric  
PO box 9175  
Phila. Pa. 19113

**CONFIDENTIAL**

1. Respondent's name and position:  
J.F. WALDRON
2. Type(s) of products manufactured: [Please specify in detail the products  
produced and the amount of processing done by your firm (example: Women's  
dresses, cut and sewed from purchased fabric). If you manufacture  
several products, please list them and indicate which products are the  
major ones. Also, note activities other than manufacturing, such as  
retailing and wholesaling, that are carried out at the plant listed if  
the estimates of waste generation include waste from these activities.]

Steam & Gas Turbines

Heat Transfer Apparatus

3. Average employment: 1972  
1971 8500, 1968 7500.

4. What type and size containers are used to store solid waste on your  
premises for disposal by the municipality, waste disposal company, or  
your employees. Please be specific (examples: 55 gal. drums; boxes  
3' x 4' x 3'). Also, how often is the solid waste or refuse removed  
from your plant and how many containers are taken away (on average)  
each time refuse is removed?

Type of Container	Number Removed	How often are they removed?
1. 40 cu. yd. (closed)	Compacted	6-7 loads per week
2. 40 cu. yd. (open top)	Crating & Shipping Lumber	15 loads per week
3. 30 cu. yd. (open top)	Crating & Shipping Lumber	17 loads per week

CONFIDENTIAL

5. Please indicate the amount of each kind of material listed below generated by your firm as refuse or solid waste. If it is not possible to give a detailed breakdown on the amounts of different types of materials, please indicate the total amount of solid waste and, in the column headed "%", estimate the percentage of the total accounted for by each type of material.

[Solid waste or refuse is defined here as any materials other than your finished products that are generated as a result of your firm's operations and that must be removed from your premises. Include any materials that are sold or given away for reuse as scrap materials in these estimates. Do not include materials that are recycled internally by your firm and which do not leave the plant.]

Type of Material	Amount (fill in one)			Per (check one)			%	Explanation: More detailed description of the type of material.
	tons	cu. yds. compacted	cu. yds. uncompacted	year	month	week		
Non-Production Refuse								
1. Office trash		75				✓	6.2	
2. Cafeteria waste		50				✓	4.1	
Production Refuse								
3. Paper		30				✓	2.5	
4. Cardboard		35				✓	2.9	
5. Wood		10	1000			✓	83.6	
6. Rags & textiles		1				✓	.1	
7. Plastic		2				✓	.3	
8. Rubber		0.5				✓	.03	
9. Glass		0.5				✓	.03	
Food processing								
10. waste		0						
11. Metal:ferrous	65					✓	2	1
12. Metal:non-ferrous	10	0.5				✓	.03	(.1)
Petroleum and								
13. paints		.1				✓	.01	
14. Chemicals		.1				✓	.01	
Soil, sand, and								
15. ashes		0						
16. Sewage sludge		0						
Other (specify type)								
17. Waste city water	500					✓		
18. Waste liquid other	40					✓		
TOTAL		200	1000					

**CONFIDENTIAL**

6. The information given in Question 5 is (1) estimated ☒ (2) from actual records ☐

7. Are any of the refuse materials sold or given away to be salvaged (for example, waste paper sold to a broker or ashes given away to be used as fill material)? If so, what materials?

Ferrous + Non Ferrous scrap metals are sold for salvage

8. Does your firm use any scrap materials as inputs (for example, scrap metal or reclaimed paper)?

No - except residual fuel oil

9. Was the change in the amount of solid waste generated proportional to the changes in output and employment between 1968 and 1971?

Yes ☒ No ☐

If no, please explain.

Were different types of materials generated as solid waste in 1968?

Yes ☐ No ☒

If yes, please explain.

10. Name and address of waste removal company used by your firm.

Eastern Industrial Corp.  
3300 S. 61 st.  
Phila., Pa. 19153





## INTERNAL REVIEW AND RECOMMENDATIONS

## REGIONAL ENGINEER'S REVIEW

NAME OF APPLICANT Westinghouse Electric Corporation PROJECT Tinicum Township APPLICATION NUMBER 237226A  
LOCATION Delaware County

**BRIEF DESCRIPTION OF PROJECT:** The applicant is seeking a permit for the existing discharge of once-through cooling water and also proposes to construct treatment facilities for powerhouse wastewater, a small portion of which is currently being treated before discharge. There are four discharge points into three inlets of the tidal Delaware River.

**DISCUSSION (Use Additional Sheets if Necessary):** The wastewater treatment facilities will consist of an equalization tank, a mixing tank and two flocculator-clarifiers with a vacuum filter for sludge conditioning. Approximately 200,000 gpd of wastewater will be treated by the facilities and the effluent will be discharged along with cooling water from discharge point 001. The wastewater is a combination of boiler blowdown, softener backwash, rinse and regenerant, demineralizer backwash, rinse and regenerant, evaporator blowdown, filter backwash and wastewater collected in sumps.

**CURRENT ESTIMATE OF COMPLETION DATE OF PROJECT (Industrial Wastes Only)** 4/15/74

## RECOMMENDATION AND ACTION

**APPROVAL - RELEVANT LAWS, REGULATIONS, STANDARDS, AND POLICIES HAVE BEEN COMPLIED WITH:**

Issue By Region	Issue By Central Office	Refuse	Signature	Date
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>David A. Wolf</i> REVIEWING ENGINEER	7/12/73
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>Richard L. Henkle</i> FACILITIES ENGINEER	7/12/73
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>Richard L. Henkle</i> REGIONAL ENGINEER	7/12/73
	<input type="checkbox"/>	<input type="checkbox"/>	DIV. FACILITIES ENGINEER	
	<input type="checkbox"/>	<input type="checkbox"/>	DIVISION DIRECTOR	
<b>PERMIT CONDITIONS:</b>		<input type="checkbox"/>	BUREAU DIRECTOR	

1. STANDARD - Industrial Waste  
10/1/71

2. SPECIAL (Use Additional Sheets if Necessary) -

- A. pH limits, iron limit  
B. evidence of efficiency

- C. compliance with heated waste regulations  
D. dissolved solids  $\leq$  2500 mg/l, oil  $\leq$  10 mg/l  
suspended solids  $\leq$  20 mg/l

Continued

- 2 -

Wastewater will be pumped to the equalization tank from "A" Plant Powerhouse / Plant Powerhouse utilizing two lift stations.

An average of approximately 21 MGD of once-through cooling water is discharged through four discharge pipes with the overwhelming majority coming from charge point C01. The heated waste is generated by condenser cooling at the powerhouses and turbine testing facilities. Discharge no. 003 has been discontinued as the facility generating this wastewater has been relocated. The discharge pipe has not been plugged and it is not known whether or not this discharge point will be used in the future.

There is also wastewater generated by a blade cleaning operation that was formerly discharged to an impoundment. This wastewater is now being hauled away for final disposal by Rollm's Environmental Inc. and the process producing the wastewater will be discontinued by 6/74. An application has been submitted to the Division of Solid Waste Management for the backfilling of the impoundment with clean fill over a three year period.

There is also cooling tower blowdown that is now discharged without treatment along with the once-through cooling water. The blowdown contains a biocidal agent known as Betz C-5P in an amount in excess of the Delaware River Basin Commission regulation on persistent pesticides. The Company maintains that, since the concentration of Betz C-5P in the combined effluent is below the DREC standard, they are in compliance with the regulation. However, they have agreed to investigate methods of meeting the DREC standard in the cooling tower blowdown discharge without dilution with once-through cooling water and will submit a schedule for this work. We feel it would not be in the best interests of the Water Quality Program to delay construction of the powerhouse treatment plant for final details of the solution to the blowdown problem.

Otherwise, all existing and proposed discharges are consistent with the Water Quality Standards developed by this Department and the DREC for this section of the Delaware Estuary. The dissolved solids concentration in the effluent from the powerhouse treatment plant will exceed the recommended guideline of 1,000 mg/l, but since the increase in dissolved solids of the receiving stream is less than 1.6%, the discharge has been approved. Based on the report on the thermal mixing zone submitted with the application and on Module 4 of the engineering report, the thermal discharge has been approved.

All solid wastes generated by the treatment process will be hauled away by Eastern Industrial Corporation to one of the following landfills:

Xin-Bac Landfill, Edison, New Jersey  
Kinsley Landfill, Deptford, New Jersey  
Mac Landfill, Deptford, New Jersey



**SOLID WASTE MANAGEMENT (Continued)**

3. Attach a list of disposal sites used by the facility, detailing location, inclusive dates, materials disposed of, estimated quantities.

<u>Location</u>	<u>Transporter</u>	<u>Dates</u>	<u>Materials</u>	<u>Quantities</u>
<u>Trash</u>				
Kinsley Landfill	Eastern	1970-11/84	Wood, Paper, Garbage, Etc.	120 tons/yr. Present
(W) Lester	(W)	1957-1970 ?	" "	7500 tons/yr.
<u>Hazardous Waste</u>				
CECOS Treatment Corp. 51 Broderick Rd. Bristol, CT	CECOS Int'l.	2/14/85	Corrosive Liquids	5 Containers
CECOS International 56th Street & Niagara Falls Blvd. Group Niagara Falls, N.Y.	Environmental Transport	2/14/85	Solidified Paint Sludge	52 Containers
CECOS Environmental 56th Street & Niagara Falls Blvd., Group Niagara Falls, N.Y.	Environmental Transport	2/ /85	Empty Drums & Pails	22 Drums 131 Pails
CECOS International 56th Street & Niagara Falls Blvd. Group Niagara Falls, N.Y.	Environmental Transport	2/14/85	Solidified Paint Sludge	49 Containers

WCW/Checklist